

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
*Norfolk Division*

UNITED STATES OF AMERICA

v.

LATEYA CONLEY,  
a/k/a "Teya"

Defendant.

Criminal No. 2:22CR147-04

**CRIMINAL INFORMATION**

THE UNITED STATES ATTORNEY CHARGES THAT:

**COUNT ONE**

(Conspiracy to Commit Money Laundering)

1. The factual allegations contained in the General Allegations section of the Superseding Indictment in Criminal No. 2:22cr47 are incorporated herein by reference as if set out in full.

2. From beginning in or about January 2020, and continuing up to and including November, 2022, the exact dates to the Grand Jury being unknown, within the Eastern District of Virginia and elsewhere, the defendant, LATEYA CONLEY, a/k/a "Teya," and CORTNEY CONLEY (C. CONLEY), did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons, known to the Grand Jury, to commit an offense against the United States in violation of Title 18, United States Code, Section 1956, to wit:

- a. Laundering of monetary instruments, that is, to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy

to manufacture, distribute, and possess with intent to manufacture and distribute controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1), knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

Object of the Conspiracy

3. The object of the conspiracy was for the defendant LATEYA CONLEY, C. CONLEY, and others to move and conceal the proceeds of the conspiracy and to promote the distribution of controlled substances.

Ways, Manner, and Means of the Conspiracy

4. It was part of the conspiracy for the defendant, LATEYA CONLEY, C. CONLEY, and others, to collect and deposit a percentage of profits obtained by the co-conspirators as a result of the distribution and trafficking of controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1), into various bank accounts, including accounts held at Navy Federal Credit Union (NFCU), Bank of America, Wells Fargo, and JPMorgan Chase.

5. C. CONLEY has an account in the name of “Urban Leaf Shop,” ending in x2047 at Bank of America. LATEYA CONLEY has the following accounts:

- a. Account ending in x3292 at JPMorgan Chase;
- b. Account ending in x5062 at Wells Fargo; and

c. Accounts ending in x3179, x4208, and x3132 at NFCU.

6. C. CONLEY routinely deposited proceeds of the specified unlawful activities into the accounts and LATEYA CONLEY routinely removed those proceeds from those account via ATM withdrawals.

Overt Acts

7. LATEYA CONLEY made and caused to be made the following financial transactions:

| <b>Date</b>                 | <b>Amount</b> | <b>Description</b>   |
|-----------------------------|---------------|--|
| 04/06/2022                  | \$6,952.72    | LATEYA CONLEY caused a payment to be made to her Synchrony Bank Care Credit Card from Bank of America Account (x2047). |
| 06/01/2022                  | \$1,603.07    | LATEYA CONLEY caused a payment to be made to Mercedes Benz from JPMorgan Chase Account (x3292).                        |
| 10/15/2021<br>to 03/22/2022 | \$3,816.00    | LATEYA CONLEY caused payments to be made to her Capital One Credit Card from Wells Fargo Account (x5062).              |
| 8/12/2021<br>to 01/04/2022  | \$16,257.10   | LATEYA CONLEY caused payments to be made to Infinity Apartments from NFCU Account (x3179).                             |
| 03/16/2020<br>to 06/21/2022 | \$410.09      | LATEYA CONLEY caused payments to be made to a credit card account from NFCU account (x4208).                           |
| 3/12/2021                   | \$500.00      | LATEYA CONLEY caused a payment to be made to an investment account from NFCU account (x3132).                          |

(In violation of Title 18, United States Code, Sections 1956(a) and 1956(h)).

CRIMINAL FORFEITURE


1. The defendant, if convicted of the violation alleged in Count 1 of this Criminal Information, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:
  - a. Any property, real or personal, involved in the offense, and any property traceable to such property.
  - b. Any firearm or ammunition involved in or used in the violation.
2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).
3. The property subject to forfeiture includes but is not limited to:
  - a. A .45 caliber semi-automatic pistol and two 9mm semi-automatic pistols, and any related magazines and ammunition, seized from an address on Wintercress Way in Chesapeake, Virginia, on or about May 13, 2022;
  - b. A SCCY 9mm semi-automatic pistol, and any related magazines and ammunition, seized from an address on Magnolia Run in Chesapeake, Virginia, on or about May 26, 2022;
  - c. A Smith & Wesson 9mm semi-automatic pistol, and any related magazines and ammunition, seized from an address on Infinity Lane in Virginia Beach, Virginia, on or about May 26, 2022;

- d. A teal TP9 SF Elite 9mm semi-automatic pistol, and any related magazines and ammunition, seized from an address on Old College Drive in Suffolk, Virginia, on or about July 26, 2022;
  - e. A Glock 9mm semi-automatic pistol and a Glock 23 .40 caliber semi-automatic pistol, and any related magazines and ammunition, seized from an address on New Town Road in Virginia Beach, Virginia, on or about November 8, 2022.
- (In accordance with 18 U.S.C. § 924(d)(1); 18 U.S.C. § 982(a)(1); and 28 U.S.C. § 2461(c)).

Respectfully submitted,

Jessica D. Aber  
United States Attorney

Date: 7/12/2023

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